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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MUZAFFAR HUSSAIN,

Defendant.

No. CR-13-00408-JST

STIPULATION FOR PRODUCTION OF
MATERIALS AND ~~PROPOSED~~
PROTECTIVE ORDER

Defendant, Muzaffar Hussain, and the United States of America, hereby stipulate and agree, that the United States will produce documents to defendant pursuant to the following terms:

(1) As used in this order, the word "Defendant" means the defendant; defense counsel actively representing the defendant in this case; and partners, associates, secretaries, paralegal assistants, and employees of defense counsel, but only to the extent reasonably necessary to render professional services in this case. The words "Confidential Material" means documents marked as ROGINV000001-ROGINV031752, and excludes materials which are identified on a privilege log, which is also Confidential Material within the scope of this order.

(2) Defendant is to treat as confidential all Confidential Material that is produced or made available for use in preparing for trial of this case.

1 (3) Defendant and any person to whom any Defendant or the United States discloses
2 Confidential Material, as permitted by this Order, must be shown a copy of this Order and be informed
3 that such material is confidential and must be treated as such.

4 (4) Defendant, any person to whom Defendant discloses Confidential Material, and any person to
5 whom the United States discloses Confidential Material, shall not make any further disclosure of the
6 Confidential Material, except as provided herein, absent further order of this Court.

7 (5) The Confidential Material, including all copies thereof, may be disclosed by Defendant to
8 another person only for the purpose of assisting Defendant in preparing a defense in this case, and may
9 be disclosed by the attorneys for the United States only for the purpose of assisting the United States in
10 preparing its prosecution or complying with its discovery obligations in this case. Only as much of the
11 materials as may be useful for such purpose may be disclosed by the attorneys for the United States and
12 the Defendant. Defendant and those persons to whom he discloses Confidential Material in accordance
13 with this Order shall not make any copies of the material, reveal the contents of the material, or use the
14 information contained therein, for any purpose other than preparing a defense in this case. The persons
15 to whom the United States discloses Confidential Material in accordance with this Order shall not make
16 any copies of the material, reveal the contents of the material, or use the information contained therein,
17 for any purpose other than assisting the United States in preparing for prosecution or complying with its
18 discovery obligations in this case.

19 (6) All Confidential Material, and any copies thereof, disclosed to Defendant or third parties
20 shall be returned to counsel for the defense at the earliest of: (a) the end of this case and any appeals; or
21 (b) such time as it is no longer necessary for the person to possess such material. At the end of this case
22 and any appeals, defense counsel shall certify in writing to attorneys for the United States that they have
23 received all Confidential Material and copies that were given to the Defendant or third parties. Also at
24 that time, defense counsel shall either destroy all Confidential Material or return it to attorneys for the
25 United States. If defense counsel elect to destroy any Confidential Material rather than return it to the

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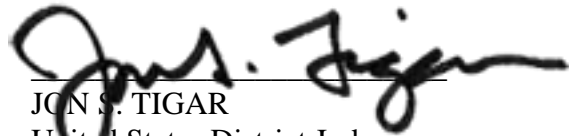
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1 attorneys for the United States, they shall certify in writing to the attorneys for the United States that
2 such material has been destroyed.

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4 _____/s/_____
CYNTHIA STIER
Counsel for United States

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6 _____/s/_____
7 DAVID J. COHEN
8 Counsel for Muzaffar Hussain

9 SO ORDERED THIS 13th day of October, 2015.

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12 JON S. TIGAR
United States District Judge